FILED

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

OCT 0 7 2015 mm

UNITED STATES OF AMERICA,	MATTHEW J. DYKMAN
Plaintiff,	CRIMINAL NO. 15 - 3556 JB
vs.) Counts 1-3: 18 U.S.C. §§ 2252A(a)(2), (b)(1), 2256: Distribution of Child Pornography;
PAUL KEENAHAN,) 2230. Distribution of Clinia Fornography,
,	Counts 4-6: 18 U.S.C. §§ 2252A(a)(5)(B),
Defendant.) (b)(2), and 2256: Possession of Child
) Pornography.
)

<u>INDICTMENT</u>

The Grand Jury charges:

Count 1

On or about July 17, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN**, did knowingly distribute and attempt to distribute child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 2

On or about July 18, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN**, did knowingly distribute and attempt to distribute child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any

means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 3

On or about July 19, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN**, did knowingly distribute and attempt to distribute child pornography that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(2), (b)(1), and 2256.

Count 4

From on or about November 20, 2014, and continuing to on or about July 23, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN** did knowingly possess child pornography that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which was produced using materials which had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, a Toshiba laptop, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2), and 2256.

Count 5

From on or about August 25, 2014, and continuing to on or about July 23, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN** did knowingly possess child pornography that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which was produced using materials which had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, a Toshiba external hard drive, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2), and 2256.

Count 6

From on or about February 14, 2012, and continuing to on or about July 23, 2015, in Bernalillo County, in the District of New Mexico, the defendant, **PAUL KEENAHAN** did knowingly possess child pornography that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means including by computer, and which was produced using materials which had been mailed, and shipped and transported in and affecting interstate and foreign commerce, by any means including by computer, DVDs, the production of which involved the use of a minor engaging in sexually explicit conduct, and which visual depiction was of such conduct.

In violation of 18 U.S.C. §§ 2252A(a)(5)(B), (b)(2), and 2256.

FORFEITURE ALLEGATIONS

Upon conviction of any of the violations alleged in this Indictment involving violations of 18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B), Defendant PAUL KEENAHAN shall forfeit to the United States, pursuant to 18 U.S.C. § 2253, any and all of the defendant's right, title and interest in:

- A. Toshiba Laptop, MK3275GSX, 320 GB Internal Hard Drive S/N 62L8YOISF Q19 EC.A.;
- B. Toshiba USB 3.0 External Hard Drive, containing Toshiba MQ01UBD100, 1 TB Hard Drive, S/N: X2H3TYDLT TS8 HDKBD09AYA01 T.; and
- C. Eight DVDs, labeled as: "PTHC 1"; "PTHC 2"; "PTHC 3"; "PTHC 4"; "PTHC 5"; "J"; "Shameless Young Teens"; and "TL 1."

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

09/30/15 1:15PM